



Kris McLean <kris@krismcleanlaw.com>

Waiver of Service

2 messages

Kris McLean <kris@krismcleanlaw.com>

Sun, Dec 29, 2019 at 10:54 PM

To: Josh Kalish <josh@ogslawllc.com>, ridley@ridleylaw.com, Tyson McLean <tyson@krismcleanlaw.com>

Josh and Patrick,

Attached are two Complaints filed last week against Mr. Goettsche here in Montana and an acknowledgement of service and waiver of summons for each Complaint that we hope one of you will sign on Mr. Goettsche's behalf and return via email tomorrow (12/30).

Also attached is Kevin Washington's Draft Emergency Motion for Appointment of a Receiver, Draft Brief in Support of Emergency Motion to Appoint a Receiver, Draft Proposed Order Appointing Receiver, Draft Bitcoin Protocol that will be attached as part of the Order Appointing Receiver, Affidavit of Kevin Washington and Affidavit of Richard B. Tabish. We plan to file these documents tomorrow (12/30).










CryptoWatt's Bitcoin mining facility at Butte is a very valuable asset of majority owner Goettsche and minority owner Washington. As recounted in the attached papers, the facility has been shut down since Matt's arrest because he is not available to pay the expenses and the facility's power contract is in arrears. The facility's value decreases drastically if the power contract is not brought into good standing-and the power contract will be lost completely if it is not brought into good standing in the very near future. Appointment of a receiver is the best opportunity to obtain a power contract, bring the facility back into operation and preserve this valuable asset. But, time is critical for maintaining the power contract-we must get a receiver appointed as soon as possible.

I am providing these draft documents for your review in hopes that Mr. Goettsche and you as his counsel will agree to the appointment of a receiver and we can advise the Court that the Emergency motion will not be contested by Mr. Goettsche.



Please review these attached documents at your earliest convenience and give me a call to discuss.

Best Regards,
Kris

14 attachments

-  **Emergency motion.pdf**
124K
-  **Brief in Support of Emergency motion.pdf**
160K
-  **Washington affidavit.pdf**
131K
-  **Tabish affidavit.pdf**
136K
-  **Proposed Order for Appointment of Receiver.pdf**
233K
-  **Bitcoin protocol.pdf**
168K
-  **acknowledgment of service form.pdf**
117K
-  **Washington complaint.pdf**
154K
-  **Tabish affidavit.pdf**
136K

Washington affidavit.pdf

 131K **FX Complaint.pdf**
163K **acknowledgment of service form.pdf**
117K **complaint file stamped.pdf**
527K **complaint filed stamped first page.pdf**
580K

Josh Kalish <josh@ogslawllc.com>

Mon, Dec 30, 2019 at 7:53 AM

To: Kris McLean <kris@krismcleanlaw.com>

Cc: Patrick Ridley <ridley@ridleylaw.com>, Tyson McLean <tyson@krismcleanlaw.com>

Kris -- confirming receipt. I will be in touch asap this afternoon EST once I've had a chance to review.

[Quoted text hidden]

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**Josh Kalish | Partner, Odell Girton Siegel LLC**josh@ogslawllc.com

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